UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 2 4 2014

Robert Smith
Planning Division, Environmental Branch
26 Federal Plaza
New York, New York 10278-0090

Dear Mr. Smith:

The U.S. Environmental Protection Agency has reviewed the Downtown Montauk Stabilization Project Draft Environmental Assessment (EA). The purpose of the project is to address erosion which occurred during Hurricane Sandy, leaving the Montauk area of Long Island, New York vulnerable to future storms. The draft EA states that the project intends to provide protection to the project area while the overall Fire Island Inlet to Montauk Point (FIMP) Reformulation Study is being finalized.

The document states, "the recommended plan utilizes information and data from the ongoing FIMP study to develop a one-time stabilization project that does not limit the options being considered or presuppose the outcome of the Reformulation study." Section 1.5 states that the FIMP Reformulation Study is currently evaluating five alternatives (beach restoration; beach restoration and buried seawall; feeder beach; dune reinforcement; and dune reinforcement and feeder beach). The draft EA indicates that a stabilization project for Downtown Montauk must: 1) be compatible with the likely outcome of the Reformulation process; 2) be economically justified as a separate, independent project; and 3) be limited in duration to provide stabilization prior to implementation of the FIMP Reformulation. A reinforced dune spanning the length of the project area was the selected alternative for the interim effort.

While compatibility is a criteria for alternative selection, the EA should discuss in detail how a reinforced dune would be addressed under each of the FIMP Reformulation alternatives to demonstrate that the selected alternative would not presuppose the Reformulation outcome and to identify the cumulative impacts to resources that would result from implementation of both projects. Having compatible outcomes (i.e., of enhancing protection of the project area) as well as the limited duration of the downtown Montauk stabilization, does not preclude greater environmental impacts. Therefore, clarification is needed to illustrate the way that the two

projects will complement one another as opposed to simply working to achieve the same goal regardless of approach. This discussion should include what costs are expected to be offset for the future project as a result of this stabilization effort.

The draft EA states that since the sand-filled geotextile bags to be used in the selected alternative are susceptible to vandalism, puncture, and deterioration from UV light, they will be covered by a minimum of 3 feet of sand to decrease the likelihood of exposure. The EA should include a discussion of the expected fate of the geotextile bags at the end of the project life, or in the event that they prematurely become unearthed as the result of another superstorm. This discussion should include any possible risks to wildlife that can result from portions of deteriorated bags being washed into the ocean (including risks to threatened and endangered species such as sea turtles and piping plovers as well as marine mammals such as harbor and grey seals that reside in the area and subsist on small fish which could appear similar to small pieces of geotextile material floating in near shore waters). Additionally, inland impacts from possible dune erosion or failure in the event of a major storm should be discussed. Impacts can result from elevated storm tides and high waves that accompany major storms. The eroded sand can be transported landward by surging water. The sand and water can wash over or break through the dunes, significantly impacting the landward side of the barrier dune. Potential costs of clean-up and removal that could be required should also be discussed in the context of geotextile bag deterioration and dune failure.

The addition of reinforced dunes could have an indirect impact on the flow of inland stormwater, particularly during major rain events. Expected impacts of diverted stormwater and potential remedies should be discussed in the EA.

After the 15 year duration of the reinforced dune to provide stabilization against the design storm, it is expected that the project would provide a decreasing level of protection and eventually no protection after approximately 25 years. Given that the FIMP is expected to be implemented in less than 15 years, the draft EA should include a discussion of the expected condition of the reinforced dune when the FIMP Reformulation project is implemented. Included in the discussion should be an assessment of whether there will be cost savings for the future project (e.g., through reuse of materials) or if the interim stabilization project could result in increased costs for the FIMP (in the form geotextile bag removal, additional sand relocation, etc).

Thank you for the opportunity to comment on this project. Should you have any questions concerning this letter, please feel free to contact Stephanie Lamster of my staff at 212-637-3465.

Sincerely,

Grace Musumeci

Grace Musumeci, Chief
Environmental Review Section